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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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KARUNAMUNIGE CHAMILA	)	Civil Action No. 2:09-CV-05395 DMC-MF
KRISHANTHI, <i>et al.</i> ,	)	
Plaintiffs,	)	<b>Declaration of Joseph J. DePalma</b>
v.	)	
RAJAKUMARA	)	
RAJARATNAM, <i>et al.</i>	)	
Defendants.	)	

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JOSEPH J. DEPALMA, of full age, hereby certifies as follows:

1. I am a member in good standing of the State Bar of New Jersey, who has appeared in this litigation.
2. I am a member of the law firm Lite Depalma Greenberg LLC, representing all Plaintiffs in this litigation.

3. I make this declaration in support of Plaintiffs' Opposition To The Motion To Dismiss Amended Complaint Against Defendant Tamil Rehabilitation Organization.

4. I have personal knowledge of the matters set forth in this Declaration, and can testify competently to them if called upon to do so.

5. A true and correct copy of the transcript of the May 8, 2013 Deposition of Ramanathan Ranjan is attached hereto as Exhibit 1.

6. A true and correct copy of the State of New Jersey Property Records for 8 Wheatston Court, Princeton Junction, New Jersey 08550 (available at <http://tax1.co.monmouth.nj.us/cgi-bin/m4.cgi?&district=1113&block=111&lot=13&qual=> is attached hereto as Exhibit 2.

7. A true and correct copy of Check No. 3393 from Sivaja & Ramanathan Ranjan to TRO (Feb. 19, 2005) [MR-LTTE-MT-0285] is attached hereto as Exhibit 3.

8. A true and correct copy of Check No. 398 from Sivaja & Ramanathan Ranjan to WTCC (Dec. 18, 2002) [USAO.2 23493] is attached hereto as Exhibit 4.

9. A true and correct copy of the Home Page to TRO-USA's Website, <http://www.trousa.org>, from June 22, 2003 is attached hereto as Exhibit 5.

10. A true and correct copy of an advertisement for TRO's Fourth Annual Fund Raising Event on Sangam.org from May 14, 2003 is attached hereto as Exhibit 6.

11. A true and correct copy of an advertisement for TRO's Fifth Annual Fund Raising Event on Sangam.org from October 23, 2004 (<http://www.sangam.org/articles/view2/?uid=588>) is attached hereto as Exhibit 7.

12. A true and correct copy of an email from Janarthanan Pillai to the tamil@tamil.net listserv on June 4, 2000 is attached hereto as Exhibit 8.

13. A true and correct copy of an advertisement for the Puthukkudiyiruppu Bomb Victims Fund Appeal on Sangam.org from October 15, 1999 (<http://www.sangam.org/BombVictimsFund.htm>) [USAO.1 02802-02808] is attached hereto as Exhibit 9.

14. A true and correct copy of TRO's appeal for urgent assistance on TamilNet from December 24, 2004 (<http://www.tamilnet.com/art.html?catid=13&artid=13715>) is attached hereto as Exhibit 10.

15. A true and correct copy of the Local Contacts page to TRO-USA's Website (<http://www.trousa.org>) is attached hereto as Exhibit 11.

16. A true and exact copy of an advertisement for a TRO fund raising event Oct. 6, 2002 from the TRO-USA Website and relating to TRO's 3<sup>rd</sup> Annual Fundraising Dinner on Mar. 24, 2002 on TRO-USA's Website is attached hereto as Exhibit 12.

17. A true and correct copy of TRO-USA's 2008 Personal Property Return to the State of Maryland is attached hereto as Exhibit 13.

18. A true and correct copy of Ram Ranjan's Application for the Use of School Facilities from the South Brunswick Board of Education on September 23, 2004 is attached hereto as Exhibit 14.

19. A true and exact copy of an email from Domain Update Center to Ram Ranjan dated February 15, 2005 containing Final Notice regarding the domain troussa.org.Domain Extension [INV 0025-26] is attached hereto as Exhibit 15.

20. A true and exact copy of an email from Thaya Nagarajah to Ram Ranjan dated May 18, 2005 [INV 00228] is attached herto as Exhibit 16.

21. A true and exact copy of an email from Shawn Srishan to Ram Ranjan dated March 21, 2005 [INV 00170] is attached hereto as Exhibit 17.

22. A true and exact copy of the article "Group Denies Link to Terrorism" from the Newark Star Ledger dated December 21, 2006 is attached hereto as Exhibit 18.

23. A true and exact copy of an email from K. Thirukumaran to Ram Ranjan *et al.* dated December 27, 2006, [INV-1610-1612] is attached hereto as Exhibit 19.

24. A true and exact copy translated transcript audio file of a Ram Ranjan speaking at July 23, 2000 TRO fundraising event is attached hereto as Exhibit 20.

25. A true and exact copy of a brochure advertising the December 6, 2002 WTCC Heroes Day Celebration [MR-LTTE-CW1-00015-17] is attached hereto as Exhibit 21.

26. A true and exact copy of a Translation of the WTCC Heroes Day Celebration Brochure is attached hereto as Exhibit 22.

27. A true and exact copy of a summary of an FBI informant's conversations from the November 6, 2004 TRO event [USAO 004186-4199] is attached as Exhibit 23.

28. A true and exact copy of an invoice from the South Brunswick Board of Education dated November 3, 2004 relating to the October 23, 2004 TRO event at Crossroads North Middle School is attached hereto as Exhibit 24.

29. A true and exact copy of a United States Attorneys Office event summary [USAO 002725] is attached hereto as Exhibit 25.

30. A true and exact copy of TRO's Tsunami Relief Contributions dated January 7, 2005 [D.E. 128-1] is attached hereto as Exhibit 26.

31. A true and exact copy of Rajaratnam Family Foundation 990 Tax Forms for 2002, 2003, 2004 and 2005 is attached hereto as Exhibit 27.

32. A true and exact copy of a letter from Julie Shifman, Thompson Hine & Flory LLP, to the Internal Revenue Service dated March 19, 1999 is attached hereto as Exhibit 28.

33. A true and exact copy of United States unclassified cable is attached hereto as Exhibit 29.

34. A true and exact copy of the November 15, 2007 press release entitled Treasury Targets Charity Covertly Supporting Violence in Sri Lanka is attached hereto as Exhibit 30.

35. A true and exact copy of the July 1, 2010 06-616 Sentencing Submission, United States of America against Murugesu Vinayagamoorthy, et al. is attached hereto as Exhibit 31.

36. A true and exact copy of the April 23, 2007 complaint United States of America against Karunakaran Kandasamy is attached hereto as Exhibit 32.

37. A true and exact copy of the Seylan Bank Document representing TRO in Sri Lanka received \$190,000 in September 2005 and received \$250,000 in April 2006 is attached hereto as Exhibit 33.

38. A true and exact copy of the April 23, 2007 complaint United States of America against Karunakaran Kandasamy is attached hereto as Exhibit 32.

39. A true and exact copy of the Proof of Service is attached hereto as Exhibit 34

40. A true and exact copy January 10, 2004 Letter from K.P. Reggi, MR-LTTE-CW1-000013 is attached hereto as Exhibit 35.

41. A true and exact copy of Defendant Tamil Rehabilitation Organizations Responses to Plaintiffs First Set of Jurisdictional Interrogatories is attached hereto as Exhibit 36.

42. A true and exact copy November 21, 2007 Email INV-07489 – INV-07491 is attached hereto as Exhibit 37.

43. A true and exact copy of Raj Rajaratnam's November 2002 Speech in North Brunswick, New Jersey attached hereto as Exhibit 38.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 2, 2014

/s/ Joseph J. DePalma

Joseph J. DePalma

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